November 26, 2003

Ann Veneman, U.S. Secretary of Agriculture Docket No. 03-080-1 Regulatory Analysis and Development, PPD, APHIS, Station 3C71 4700 River Road Unit 118 Riverdale, MD 20737-1238

## Dear Secretary Veneman:

The American Veal Association (AVA) is the official trade organization representing nearly 1000 Special Fed Veal Producers in the United States. Our organization would like to express that we do not support the USDA's decision to reopen the Canadian border to trade of live cattle in the near future. It is our opinion that the decision is too premature and is not in step with the research and science pertaining to the disease Bovine Spongiform Encephalopathy. The AVA believes this to be an unprecedented move and includes a high degree of risk to American consumers and farmers.

Although we understand the importance of resuming trade with Canada, this decision appears to be based more on politics and seemingly little on the science behind the disease. International scientific standards say that in order to protect domestic herds from infection by Mad Cow Disease, livestock should not be imported from a nation for seven years after the disease is found there.

It is worth noting that while today veal and beef products can be imported from Canada and, pending approval of this proposal, young cattle, Canadian produced tallow is still unacceptable for importation for use in US livestock feeding systems. To us, this imbalance sends a mixed message to the American consumer. According to government policy, it is unacceptable to feed Canadian beef byproducts to our U.S. livestock, but acceptable for U.S. consumers to purchase Canadian beef and veal to feed our families.

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Since September 1, when partial trade was resumed on beef and veal products, the American veal market has deteriorated to levels comparable to market prices of pre May 20 vintage. Veal producers have again found themselves unprofitable. They have lost any market competitiveness they had when the subsidized Canadian production was not part of the equation.

One thousand veal producers are currently struggling to make their operations viable enough to continue. We believe that a decision to open the border to live cattle trade will likely sound the deathblow to many of these small family farms in this country. We ask you to consider this in any future plan to resume normal trading relations with Canada.

Sincerely,

Paul Slayton

**Executive Director** 

American Veal Association Cc: AVA Board of Directors